

www.scmv.com 750 B STREET, SUITE 2100  
619.685.3003 SAN DIEGO, CALIFORNIA 92101  
619.685.3100 FAX

SELTZER | CAPLAN | McMAHON | VITEK  
A LAW CORPORATION

NORMAN T. SELTZER  
(1918-2011)

ROBERT CAPLAN  
GERALD L. MCMAHON  
REGINALD A. VITEK  
DAVID J. DORNE  
JAMES R. DAWES

OF COUNSEL  
LAWRENCE S. BRANTON  
DAVID P. RUTH  
LAURA M. LAMB

DAVID M. GREELEY  
greeley@scmv.com  
(619) 685-3150  
(619) 702-6893 FAX

November 29, 2012

Honorable Kiyo A. Matsumoto  
United States District Court  
Eastern District of New York  
c/o Clerk of the Court  
Chambers: Room S905  
Courtroom: N6G  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Innovation Ventures, LLC et al. v. Walid Jamil et al.*  
Docket No. 12 Civ. 05354  
Our File No.: 15654.69841

Dear Judge Matsumoto:

Defendants Joseph Shayota and Tradeway International, Inc. dba Baja Exporting request that the Court consider additional materials it is submitting this evening in connection with the preliminary injunction hearing set for tomorrow.

I understand that the hearing is at 9:30 a.m. tomorrow, but given the additional evidence and arguments that Plaintiffs have raised in their reply brief and additional materials submitted today, I thought it important to address Plaintiffs' arguments in a sur reply and to submit additional evidence.

I apologize for submitting the materials so late but nonetheless respectfully request that the Court consider the sur reply brief and additional declarations and exhibits.

Respectfully,

/s/

David M. Greeley  
Seltzer Caplan McMahon Vitek  
A Law Corporation

BRIAN T. SELTZER  
ELIZABETH A. SMITH-CHAVEZ  
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PARISA F. WEISS